



Purple Communications, Inc.  
595 Menlo Drive  
Rocklin, CA 95765  
Tel 800 900 9478

October 7, 2016

Via Electronic Filing

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

**RE: Notice of Ex Parte – Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

Dear Ms. Dortch:

On October 7, 2016, Michael Strecker, Vice President of Regulatory and Strategic Policy, Purple Communications Inc. (“Purple”), telephonically met with Travis Litman, Senior Legal Advisor, Office of Commissioner Rosenworcel and Jennifer Thompson, Special Advisor and Confidential Assistant, Office of Commissioner Rosenworcel.

In the meeting, Purple discussed current competitive conditions in the VRS market, including the continued and potential impact of implementing dramatic VRS rate cuts on competitive providers’ viability and ability to compete effectively for market share. Although the 2013 VRS Reform Order set forth reforms intended to enable competitive providers to grow market share and reduce costs concurrently with the declining rates, those structural reforms have yet to be realized in the market even as rates have dropped.<sup>1</sup>

---

<sup>1</sup> *Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 & 03-123, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-82, ¶¶ 19-86 (June 10, 2013) (*2013 VRS Reform Order*).



Purple Communications, Inc.  
595 Menlo Drive  
Rocklin, CA 95765  
Tel 800 900 9478

Therefore, the need for VRS rate structure reform that will help stabilize the marketplace and the potential components of such reform were discussed.

Respectfully submitted,

**PURPLE COMMUNICATIONS, INC.**

/s/ Michael Strecker

Michael Strecker  
Vice President Regulatory and Strategic Policy

Cc: Travis Litman  
Jennifer Thompson